

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

JEFFREY BROWN,	)	
	)	
Plaintiff,	)	Case No. <u>CIV-22-170-D</u>
	)	
v.	)	
	)	Removed from District Court
HALLIBURTON ENERGY	)	of Oklahoma County
SERVICES, INC.,	)	Case No. CJ-2022-471
	)	
Defendant.	)	

**NOTICE OF REMOVAL**

Defendant, Halliburton Energy Services, Inc. ("HESI"), hereby notifies the Court and the Plaintiff that it is removing this action to the United States District Court of the Western District of Oklahoma pursuant to 28 U.S.C. §§ 1331, *et seq.* Defendant respectfully shows the Court as follows:

1. Defendant has been sued in a civil action in the District Court of Oklahoma County, State of Oklahoma, styled *Jeffrey Brown v. Halliburton Energy Services, Inc.*, Case No. CJ-2022-471 ("State Court Action"). The State Court Action was filed on January 31, 2022.

2. Plaintiff's Petition asserts state law claims of negligence, carelessness and recklessness, with damages in an amount in excess of \$75,000.

3. On information and belief Plaintiff is an individual domiciled in the state of Arkansas.

4. Defendant HESI is a foreign corporation incorporated under the laws of the state of Delaware with its principal place of business in Texas.

5. Defendant was served with process on February 11, 2022. Therefore, this Notice of Removal is timely filed pursuant to 28 U.S.C. § 1446(b)(3) because Defendant filed this Notice within thirty (30) days of its receipt of the Petition and Summons.

6. This removal is pursuant to 28 U.S.C. § 1332 because Plaintiff has alleged state law claims with damages in excess of \$75,000 and there is complete diversity amongst the parties.

7. Written notice of the filing of this Notice of Removal will promptly be given to Plaintiff and a copy of the Notice of Removal will be filed with the Clerk of the District Court of Oklahoma County, State of Oklahoma, as provided by 28 U.S.C. § 1446(d).

8. Copies of all process, pleadings, and orders filed or served upon Defendant in the aforementioned State Court Action are attached hereto as follows, and made a part hereof:

Exhibit 1	Docket Sheet
Exhibit 2	Summons
Exhibit 3	Petition

9. Defendant respectfully reserves the right to file all appropriate motions and raise all defenses and objections in this action after they have been properly removed to the United States District Court for the Western District of Oklahoma.

WHEREFORE, Defendant Halliburton Energy Services, Inc., by and through counsel, hereby removes the above-captioned case now pending in the District Court of Oklahoma County, State of Oklahoma, to the United States District Court for the Western District of Oklahoma, invoking this Court's jurisdiction.

**JURY TRIAL DEMANDED.**

Respectfully submitted,

s/ Hailey M. Hopper

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*Attorneys for Defendant  
Halliburton Energy Services, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 28th day of February, 2022, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrant:

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*Attorney for Plaintiff*

s/ Hailey M. Hopper

Hailey M. Hopper